## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

17-CR-64-DWF-KMM

Plaintiff,

v.

EDWARD S. ADAMS.

DEFENDANT'S MOTION TO SEAL DOCUMENTS FILED UNDER TEMPORARY SEAL

Defendant.

Defendant Edward Adams in the above-captioned action has filed the following under seal:

- Reply in Support of Motion Asserting Certain Privileges Implicated by Yahoo! Email Seizure
- Supplemental Declaration of Thomas Brever, Esq. (Feb. 26, 2018)
- Exhibit H to the Supplemental Declaration of Thomas Brever, Esq.

Defendant brings this motion pursuant to LR 49.1(d)(1)(A) to seal because each of the above-listed documents contains information that Mr. Adams contends contains attorney-client privileged and attorney work product material that should not be revealed to or accessed by the Government. Unless and until this Court determines that some or all of these materials are not protected by the attorney-client privilege or the work product doctrine, neither the Government nor the public may have access to these materials in their unredacted form. To allow such access may effectively constitute a waiver of the attorney-client privilege or work product protection and may defeat the purpose of Mr. Adams's motion herein to assert such privilege over these materials.

Dated: February 26, 2018 Respectfully submitted,

## /s/ Lance Wade

Joseph G. Petrosinelli (DC Bar #434280)
Lance Wade (DC Bar #484845)
Sarah Lochner O'Connor (DC Bar #1012405)
Gloria Maier (DC Bar # 1012208)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
jpetrosinelli@wc.com
lwade@wc.com
soconnor@wc.com
gmaier@wc.com

James L. Volling (#113128)
Deborah A. Ellingboe (#26216X)
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55420
Telephone: (612) 766-7000
Facsimile: (612) 766-1600
james.volling@faegrebd.com
debbie.ellingboe@faegrebd.com

Attorneys for Defendant Edward S. Adams